



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

217-782-5544
TDD 217-782-9143

October 7, 2002

Tom Krueger
U.S. EPA
77 west Jackson Boulevard
Mail Code C-14J
Chicago, Illinois 60604

Re: Downers Grove Groundwater Investigation
Draft SOW

EPA Region 5 Records Ctr.



265574

Tom:

The purpose of this letter is to provide you with comments on the draft SOW for the Ellsworth Industrial Park that you sent to the Illinois EPA. The majority of the document seems to be boiler plate that is not typically subject to change, so the Illinois EPA has only a couple of general comments. The comments are as follows:

1. Periodically through the draft SOW, you require documents to be submitted to the Illinois EPA. We would like to receive at least two copies of each submittal. I am not sure whether it is more appropriate to specify this in the SOW or in the RI/FS Order. Either way, I wanted to be sure to mention it so that enough copies are provided to the Illinois EPA.
2. The draft SOW has no mention of Natural Resource Damages. In the interest of NCP consistency, this should be included in the process.
3. The Illinois EPA raised community relations as a concern in the Draft RI/FS order. I want to raise it again here. The draft SOW does not mention a Community Relations Plan. As part of an NCP consistent investigation, a Community Relations Plan should be integrated into the process. This is particularly important at this site given the high level of public concern and visibility of the project. Drafting and finalizing the Community Relations Plan should be part of the deliverables listed in the table at the end of the draft SOW.
4. This may seem like a minor point, but it is one that requires attention up front. Throughout the document there are numerous blanks where deadlines are to be inserted for the submittal of documents or completion of tasks. All of these blanks must be filled in. To keep the project on track, we must have deadlines for all deliverables and tasks.

GEORGE H. RYAN, GOVERNOR

Letter to Tom Krueger
October 7, 2002
Page 2

Further, the U.S. EPA and the Illinois EPA must be sure to give themselves adequate time to review and comment on the submittals. It is not appropriate or prudent to require the project managers to review and comment on a submittal within 20 or 30 days when 90 or 120 days is needed. I recognize that the SOW is just a draft. The deadlines can be plugged in later. However, there are numerous deadlines in this SOW. Before something is overlooked, why not get our review deadlines plugged into the draft SOW. The only deadlines that might need to be negotiated are the deadlines for the PRPs, and I cannot imagine that you are going to be too flexible on those.

If you have any questions regarding these comments, please feel free to contact me at 217-782-9825.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark V. Gurnik". The signature is fluid and cursive, with the first name "Mark" being more prominent and the last name "Gurnik" following in a similar style.

Mark V. Gurnik
Assistant Counsel
Division of Legal Counsel

U.S. ENVIRONMENTAL
PROTECTION AGENCY
WASHINGTON, D.C. 20460